

# EXHIBIT B-7

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;  
ACCURATE BACKFLOW AND  
PLUMBING SERVICES, INC.;  
HOMESTEAD HEATING &  
PLUMBING, LLC; AIRIC'S  
HEATING & AIR CONDITIONING,  
INC.; PRIME SOURCE PLUMBING  
& HEATING CORP.; RYAN  
PLUMBING, INC.; MAZZOLA  
PLUMBING HEATING & GAS  
FITTING, INC.; SOUTH SHORE  
HEATING AND PLUMBING, INC.;  
ALL KNIGHT PLUMBING,  
HEATING AND AIR  
CONDITIONING, INC.; PLUMB  
PERFECTION, LLC, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF WALTER W. COHEN, ESQUIRE IN SUPPORT OF PLAINTIFF'S  
UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT AND  
ATTORNEYS' FEES, EXPENSES AND SERVICE AWARD**

I, Walter W. Cohen, Esq., hereby declare and state as follows:

1. I am a partner at the law firm of *Obermayer Rebmann Maxwell & Hoppel LLP* (the "Firm"). I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Award. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiff and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm that have worked on this Action are Partner, Cara A. Boyanowski, Esquire and Associate, Nicholas R. Jimenez, Esquire. Under the direction of Interim Class Counsel, the Firm undertook the following assignments:

- a. Review and edit drafts of Initial Complaint, Consolidated Amended Complaint, Plaintiffs' Questionnaire, and Brief in Opposition to Motion to Dismiss;
- b. File all subsequent documents with the Court, including the Joint Case Management Plan and subsequent Joint Status Reports and coordinating with Defendant's Local Counsel on the Rule 26(f) Conference;
- c. Conform all Pleadings filed with the Court to the Rules of the Middle District;
- d. Handle all telephone and email exchanges with Judge Conner's Law Clerks;
- e. Review and edit Omnibus Supplemental Responses to Document Requests and Interrogatories;
- f. Review, edit, and file Brief in Opposition to Supplemental Motion to Dismiss New Parties;
- g. Review and edit drafts of Liability Memorandum and Confidential Mediation Statement and Exhibits;
- h. Attend and participate in ZOOM Mediation Sessions with Mediator R. Meyer, Esq., and Lead and Defendant's Counsel;
- i. Review and edit Draft Term Sheet from Defendant's Counsel in preparation for submission to Mediator Meyer prior to continuation of Mediation Session;
- j. Review and edit Final Draft of Term Sheet following final Mediation Session;
- k. Coordinate with Defendant's Local Counsel re: communications with the Court to schedule the Hearing on the Motion for Preliminary Settlement Approval and then organize and attend the Virtual Hearing before Judge Conner; and
- l. Review and edit various drafts of Settlement Documents and then file with the Court.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at average historical rates for these attorneys along with a collective entry for the Firm's paralegals:<sup>1</sup>

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<sup>1</sup> If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys and paralegals, as well as the Firm's expenses.

<u>Attorney</u>	<u>Hours Billed</u>	<u>Amount</u>	<u>Hourly Rate</u>
<b>Walter W. Cohen, Esquire</b>	117.00	\$79,560.00	\$680.00
<b>Cara A. Boyanowski, Esquire</b>	8.90	\$6,052.00	\$680.00
<b>Nicholas R. Jimenez, Esq.</b>	85.50	\$28,642.50	\$335.00
<b>Total:</b>		<b>\$114,254.50</b>	

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.

6. During the course of this Action, the Firm incurred \$1,853.90 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

<b>CATEGORY</b>	<b>EXPENSE AMOUNT</b>
Copying, Printing and Scanning	\$223.60
Telephone and Conference Calls	
Messenger and delivery services	
Service of Process	
Carfare, Travel and Meals	
Expert Fees	
Court Reporters and Transcripts	\$80.30
Legal Research and Filing Fees	\$1,550.00
Mediators	

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Dated: November \_\_, 2020

Respectfully submitted,

OBERMAYER REBMANN MAXWELL &  
HIPPEL LLP

/s/ Walter W. Cohen, Esquire  
Walter W. Cohen, Esquire  
Supreme Court ID No. 12097  
200 Locust Street, Suite 400  
Harrisburg, PA 17101  
(717) 234-9730 Telephone  
(717) 236-2485 Facsimile